

**UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)  
SIPA LIQUIDATION  
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Adv. Pro No. 10-04878 (SMB)

Plaintiff,

v.

LISA BETH NISSENBAUM TRUST; and NEAL  
KURN, in his capacity as Trustee for Lisa Beth  
Nissenbaum Trust,

Defendants.

**PROPOSED ORDER GRANTING DEFENDANTS' MOTION TO WITHDRAW THE  
REFERENCE**

**THIS MATTER** having come before the Court on the request of Chaitman LLP, counsel for Defendants, Lisa Beth Nissenbaum Trust and Neal Kurn, in his capacity as Trustee for the Lisa Beth Nissenbaum Trust, ("Defendants"), with respect to Defendants' motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure; and the Court having reviewed all pleadings and other papers filed and submitted in connection with the motion; and good and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. Defendants' motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure is **GRANTED**; and
2. The above-captioned adversary proceeding is withdrawn from the Bankruptcy Court in its entirety.

New York, New York

Dated:

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Hon.  
United States District Judge